



W. Owen Thompson

*Environmental Engineer
Waste Minimization
Office of RCRA
Region 5*

312/886-7425

**U.S. Environmental
Protection Agency
HRM-7J
77 West Jackson Blvd.
Chicago, Illinois
60604-3590**



**Made with post-consumer paper
and soybean-based ink**

ROUTING AND TRANSMITTAL SLIP

Date

6/30/92

TO: (Name, office symbol, room number,
building, Agency/Post)

Initials

Date

1. Ruben McCullers

2.

3.

4.

5.

Action	File	Note and Return
Approval	For Clearance	Per Conversation
As Requested	For Correction	Prepare Reply
Circulate	For Your Information	See Me
Comment	Investigate	Signature
Coordination	Justify	

REMARKS

Here is the work plan for the
SEP cost module project that PRE
is doing.

Please send me a copy of the
work plan for the EBE oversight project
when it is finished. Thanks

DO NOT use this form as a RECORD of approvals, concurrences, disposals,
clearances, and similar actions

FROM: (Name, org. symbol, Agency/Post)

Room No.—Bldg.

Dwight Thompson

312

Phone No.

886-7428

5041-102

OPTIONAL FORM 41 (Rev. 7-76)
Prescribed by GSA
FPMR (41 CFR) 101-11.206



May 28, 1992

Mr. Fred Norling
Regional Project Officer -- RCRA
U.S. EPA Region 5
RCRA Enforcement Branch
77 W. Jackson Street, 8th Floor
Chicago, IL 60604

RECEIVED

JUL 07 1992

RCOM SECTION

Re: EPA Contract No. 68-W9-0006
Work Assignment No. R05041
Work Plan Addendum Letter for
RCRA Waste Minimization Initiative
Activity No. R05041CM

OWEN
THOMPSON


Dear Mr. Norling:

PRC Environmental Management, Inc., (PRC) is submitting two copies of this work plan addendum letter for the above-referenced assignment. One copy is for Sally Swanson, United States Environmental Protection Agency (EPA) Program Management Branch Chief, Office of Resource Conservation and Recovery Act (RCRA). The former EPA work assignment manager (WAM) for this assignment, Ms. Ann Budich, is now working for the EPA Underground Storage Tank program. Please forward one copy of this document to Ms. Swanson. The proposed technical approach and cost are addressed in Attachment A and LOE hours and costs are listed in Tables 1 and 2. The cost information and company financial information is business confidential.

This letter details work to develop waste minimization cost modules. EPA will be able to use the cost modules to review facility-submitted supplemental project proposals for waste minimization assessments. The scope of work for this activity is included under the original Statement of Work. However, PRC is providing additional information and the technical approach and budget for this activity for EPA approval prior to initiating work. PRC anticipates this task activity be completed within the original funding and LOE hours approved by EPA (see Amendment No. 1, dated December 30, 1991).

PRC requests that the EPA WAM approve this activity so that PRC can begin work. If you have any questions or comments on this work plan addendum, please call me or Carla Buriks at (312) 856-8700.

Sincerely,


Edward Schuessler
Regional Manager

cc: David Leotta, CO (with 1 copy)
Sally Swanson, EPA (with 1 copy)
Ed DiDomenico, PRC (letter only)
Robert Van Osten, PRC (with 1 copy)
Carla Buriks, PRC (with 1 copy)
Glen Claypool, PRC (with 1 copy)



R00080381

RCRA Records Center

ATTACHMENT A
WORK PLAN ADDENDUM NO. 1

TABLE OF CONTENTS

<u>Section</u>	<u>Page</u>
1.0 INTRODUCTION	A-1
1.1 BACKGROUND	A-1
1.2 SCOPE OF WORK	A-2
2.0 APPROACH	A-2
2.1 CONDUCT A REVIEW OF AVAILABLE INFORMATION SOURCES ...	A-3
2.2 PRESENT AVAILABLE INFORMATION TO EPA	A-3
2.3 DEVELOP AND DELIVER COST MODULES TO EPA	A-3
3.0 DELIVERABLES	A-3
4.0 WORK SCHEDULE	A-4
5.0 EXCEPTIONS TO THE ASSIGNMENT AND ANTICIPATED PROBLEMS	A-4

LIST OF TABLES

<u>Table</u>	<u>Page</u>
1 TOTAL WORK ASSIGNMENT TASK COST ESTIMATE - WORK ASSIGNMENT TASK NO. R05041CM	A-5
2 ITEMIZED OTHER DIRECT COSTS (ODCs) FOR WORK ASSIGNMENT ACTIVITY NO. R05041CM	A-6

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05041 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9). The objective of this work assignment is to provide waste minimization support to EPA for development and implementation of the Region 5 Waste Minimization Program. PRC prepared a work plan dated November 1991, which was subsequently approved by EPA. This work plan addendum details a cost module activity (Work Assignment No. R05041CM) to be performed under this work assignment. Although this activity falls under the original scope of work, PRC is providing additional clarification of PRC's approach and budget to obtain EPA approval prior to initiating work.

1.1 BACKGROUND

On October 27, 1990, the U.S. Congress passed the Pollution Prevention Act of 1990. Pollution prevention is the approach preferred by EPA to protect human health and the environment. EPA has issued policy documents stating that it will integrate pollution prevention concepts and approaches into all existing and future program activities.

Within EPA Region 5, the Resource Conservation and Recovery Act (RCRA) Program Management Branch has been tasked with establishing and maintaining a Waste Minimization Program within the Office of RCRA. The goals of this program include disseminating knowledge about waste minimization throughout Region 5, providing technical assistance to interested parties, incorporating waste minimization into consent agreements and permits, and documenting measurable waste minimization and pollution prevention. The activity detailed below will support Region 5 staff in incorporating waste minimization into consent agreements and permits.

On April 16, 1992, Bill Miner and Carla Buriks of PRC met with EPA work assignment manager (WAM), Ann Budich, and the EPA Program Management Branch Chief, Office of RCRA, Sally Swanson, and other EPA waste minimization staff. At this meeting, EPA verbally described the cost module activity to PRC.

The EPA Policy on the Use of Supplemental Enforcement Projects in EPA Settlements, dated February 12, 1991, allows facilities issued enforcement penalties the option of proposing supplemental projects to mitigate penalties. Waste minimization is one area for which supplemental project proposals are encouraged (see EPA Interim Policy on the Inclusion of Pollution Prevention and Recycling Provisions in Enforcement Settlements, dated February 25,

1991). However, at present EPA lacks adequate background information upon which to base cost reviews of proposed waste minimization projects. Therefore, EPA requested PRC to support the development of cost modules for use in assessing facility waste minimization supplemental project proposals.

After discussing the scope of this activity, EPA directed PRC to undertake three primary activities: (1) investigate and review information from current literature and reference sources to determine present cost data availability; (2) organize this information and meet with EPA personnel to discuss the nature of available information, and prepare cost modules estimating the cost of conducting waste minimization assessments at small, medium, and large facilities. The data will be used by EPA personnel in their review of facility waste minimization supplemental project proposals.

1.2 SCOPE OF WORK

The work assignment activity approach described in this letter is based on the original Statement of Work provided by EPA, PRC's discussions with EPA waste minimization staff from the Office of RCRA, and discussions with the former EPA WAM, Ms. Ann Budich (312/353-4782).

The Statement of Work prepared by EPA describes the initial goals of the Region 5 Waste Minimization Program and the initial activities to be undertaken in achieving these goals. These activities include the following: (1) initiating a Waste Minimization Technical Assistance Program (WMTAP); (2) providing waste minimization training; and (3) providing expert witness and litigation support as waste minimization is incorporated into consent agreements and permits. The activity detailed in this addendum falls under the third support role outlined above.

2.0 APPROACH

This section discusses PRC's activities and deliverables under the work assignment task. The work to be performed under this activity is based upon the Statement of Work and information verbally provided by EPA (see Section 1.1). PRC has discussed the work assignment activity and the work areas listed below with the former WAM and current EPA waste minimization staff. Work assignment activities and deliverables are discussed below.

2.1 CONDUCT A REVIEW OF AVAILABLE INFORMATION SOURCES

PRC will review available information from the following sources: (1) waste minimization literature; (2) the EPA Pollution Prevention Information Clearinghouse (PPIC); (3) EPA's Office of Research Development; and (4) PRC's internal knowledge of waste minimization assessments.

2.2 PRESENT AVAILABLE INFORMATION TO EPA

PRC will collect available information and discuss cost data availability with EPA personnel. Based upon meetings with EPA waste minimization personnel, PRC will develop the format for presenting available data.

2.3 DEVELOP AND DELIVER COST MODULES TO EPA

After discussion with EPA personnel and upon EPA approval, PRC will prepare cost modules for waste minimization assessments at small, medium, and large facilities. To the extent feasible, PRC will incorporate cost differences between waste minimization assessments conducted in-house and those conducted by outside consultants. When available, PRC will also present information on factors that could affect costs at individual facilities.

During the course of this task, PRC will work closely with EPA waste minimization staff to ensure that the end product provides valuable input for EPA staff reviewing facility supplemental project proposals.

3.0 DELIVERABLES

The primary deliverable currently anticipated for this activity is the cost module data discussed above. PRC anticipates presenting the cost module data in a report format. The report will include text summarizing available information, references used, and factors that could affect the cost of waste minimization assessments at individual facilities. PRC will discuss the format of this deliverable with EPA before report preparation to ensure that the end product provides useful information to EPA personnel reviewing supplemental project proposals. PRC will work closely with EPA to develop a delivery schedule for the cost module draft report. Upon receipt of EPA comments on the draft report, PRC will prepare a final cost module report for EPA.

4.0 WORK SCHEDULE

As discussed with the EPA staff at the April 16, 1992 meeting, the work schedule for this work assignment activity is flexible. It is anticipated that this preliminary cost module research will begin as soon as this work assignment work plan addendum is approved by EPA. PRC anticipates that work can be completed before the end of EPA's 1991 fiscal year. However, PRC will adjust its schedule as directed by EPA.

5.0 EXCEPTIONS TO THE ASSIGNMENT AND ANTICIPATED PROBLEMS

EPA requested that PRC track activity costs separately. Therefore, PRC has assigned Work Assignment Activity No. R05041CM to this cost module activity. PRC does not anticipate incurring any travel costs as part of this activity. PRC's Level of Effort (LOE) and dollar estimates for this activity are detailed in Table 1. The costs for conducting this activity consist of LOE hours (see Table 1) and Other Direct Costs (ODC) associated with telephone calls, faxes, information gathering and document reproduction (see Table 2). PRC anticipates that the LOE hours and dollars originally budgeted for this work assignment will be sufficient to include the LOE hours and dollars required for this activity.

Based on the development of the work assignment and additional, individual activities over time, long-term work may require additional dollars and LOE hours. PRC will work closely with the WAM to monitor project status and identify budget issues that may require a work assignment amendment.

TABLE 1

TOTAL WORK ASSIGNMENT TASK COST ESTIMATE
WORK ASSIGNMENT TASK NO. R05041CM
 (Prepared: May 22, 1992)

HoursP-LevelHours

P-4	50
P-3	50
P-2	150
P-1	50
Technical	<u>100</u>
Total LOE	400
Clerical	<u>20</u>
TOTAL HOURS	<u>420</u>

Dollars

Direct Labor	\$6,943
Travel	0
ODC*	607
Subcontractor Costs	0
Indirect Costs	<u>5,351</u>
Subtotal Costs	\$12,901
Base Fee (3%)	<u>387</u>
TOTAL WA COST ESTIMATES	<u>\$13,288</u>

	<u>LOE (Hours)</u>	<u>COST (\$)</u>
TOTAL THIS ACTIVITY	<u>400</u>	<u>\$13,288</u>

Note:

* For additional details, see Table 2.

TABLE 2
ITEMIZED OTHER DIRECT COSTS (ODCs)
FOR WORK ASSIGNMENT ACTIVITY NO. R05041CM

<u>Item</u>	<u>Unit Cost (\$)</u>	<u>Estimated Number of Units</u>	<u>Amount (\$)</u>
Photocopies	0.08 per copy	500	40
Postage	10.00 per package	15	150
Computers	3.60 per hour	20	72
Faxes	3.00 per fax	15	45
Long distance calls	5.00 per call	60	<u>300</u>
TOTAL ODC			<u>\$ 607</u>